

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

2019 NOV 14 PM 3:51

UNITED STATES OF AMERICA)

v.)

VERONICA LEWIS,
Defendant.)

Criminal No.

2:19-cr-92-1

CLERK
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SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

1. At all times material to this Superseding Indictment, Vermont Target Sports was engaged in the commercial business of providing training in the proper and safe use of firearms, and in the selling of firearm ammunition and firearms accessories, in interstate commerce, and such industry affected interstate commerce.

2. On or about June 29, 2015, in the District of Vermont, defendant VERONICA LEWIS, unlawfully obstructed, delayed, and affected, and attempted to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, in that defendant VERONICA LEWIS did unlawfully take and obtain personal property then in the custody and control of D.M. on behalf of Vermont Target Sports, consisting of a Smith & Wesson Model K-22 .22 caliber revolver, bearing serial number K299685 and multiple rounds of .22 caliber ammunition, from the person of and in the presence of DM., an agent of Vermont Target Sports, against his will, by means of actual force and violence.

(18 U.S.C. § 1951(a))

COUNT TWO

On or about June 29, 2015, in the District of Vermont, defendant VERONICA LEWIS did knowingly brandish, discharge, carry, and use a firearm, that is, a Smith & Wesson Model K-22 .22 caliber revolver, during and in relation to a crime of violence for which she may be prosecuted in a Court of the United States, that is, Interference with Commerce by Robbery, as set forth in Count One.

(18 U.S.C. § 924(c)(1)(A))

COUNT THREE


On or about June 29, 2015, in the District of Vermont, the defendant VERONICA LEWIS, possessed, concealed, and stored a stolen firearm, to wit: a Smith & Wesson Model K-22 .22 caliber revolver, bearing serial number K299685, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe that the firearm was stolen.

(18 U.S.C. § 922(j))

A TRUE BILL



FOREPERSON


CHRISTINA E. NOLAN (JAO)
United States Attorney
Burlington, Vermont
November 14, 2019